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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTOPHER MANDARINO,

Defendant.

Case No. 2:24-mj-1070 DBP

FELONY COMPLAINT

Count I: 18 U.S.C. § 922(g)(1), Felon in Possession of a Firearm.

Chief Magistrate Judge Dustin B. Pead

Before the Honorable Dustin B. Pead, United States Chief Magistrate Judge for the District of Utah, appeared the undersigned, who on oath deposes and says:

COUNT I

18 U.S.C. § 922(g)(1)
(Felon in Possession of a Firearm)

On or about October 28, 2024, in the District of Utah,

CHRISTOPHER MANDARINO,

defendant herein, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a

Walter Model P22 .22 caliber pistol, and the firearm was in and affecting commerce; all in violation of 18 U.S.C. § 922(g)(1).

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

Complainant, Maria G. DelMonaco, being duly sworn, hereby states the following:

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been so employed since January 2024. Prior to this position, I worked as a New York State Police Officer from 2015 to 2024. I am a graduate of the Criminal Investigator Training Program and ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. As an ATF SA, I have received specialized training in the enforcement of federal firearm and explosive laws, to include offenses occurring under Title 18 of the United States Code.

2. The statements in this affidavit do not contain all known information but rather only those facts believed necessary to establish probable cause for the requested Complaint. I am familiar with the facts and circumstances set forth herein as a result of a review of official reports and records, conversations with other law enforcement officers, and my own training and experience.

3. On October 28, 2024, CHRISTOPHER MANDARINO was stopped by local law enforcement. During a subsequent search of MANDARINO's person, officers located a Walter Model P22 .22 caliber pistol in the pocket of MANDARINO's pants.

MANDARINO has previously been convicted of a crime punishable by imprisonment for a term exceeding one year (Bank Robbery, United States District Court, District of Utah, case number 2:05-CR-00019). An ATF interstate nexus expert has confirmed that the Walther firearm was not manufactured in Utah.

4. Based on the aforementioned facts, I hereby submit that there is probable cause to believe that CHRISTOPHER MANDARINO committed the offense of Felon in Possession of a Firearm, a violation of 18 U.S.C. § 922(g)(1). I swear the information contained in this affidavit is true and correct to the best of my knowledge, information, and belief.

DATED this 4th day of November, 2024.

/s/ Maria G. DelMonaco
SA MARIA G. DELMONACO
ATF

SUBSCRIBED and SWORN before me this 4th day of November, 2024.



[Signature]
DUSTIN B. PEAD
Chief Magistrate Judge, District of Utah

APPROVED AS TO FORM:

TRINA A. HIGGINS
United States Attorney

/s/ Allison H. Behrens
ALLISON H. BEHRENS
Assistant United States Attorney